

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

ROBERT MENENDEZ, NADINE
MENENDEZ, a/k/a “Nadine Arslanian,” Wael
HANA, a/k/a “Will Hana,” JOSE URIBE, AND
FRED DAIBES,

Defendants.

No. 23-cr-490

**DECLARATION OF
Wael HANA IN SUPPORT OF
OMNIBUS PRETRIAL
MOTIONS TO DISMISS**

I, **Wael HANA**, being of full age, do hereby certify under penalty of perjury that the following facts are true:

1. I am a defendant in the above-captioned matter and submit this affidavit in support of my omnibus pretrial motion to dismiss seeking, among other relief, the suppression of evidence derived from court-authorized search warrants under the following dockets: 20 Mag. 13682; 21 Mag. 11317; 22 Mag. 242; 22 Mag. 10186; 23 Mag. 370; 23 Mag. 1206; and 23 Mag. 6481.

2. From December 23, 2020 through September 20, 2023, I owned and operated the following accounts in my business and personal capacity:

- The email account [REDACTED];
- The iCloud account associated with [REDACTED] and registration email [REDACTED];
- The email account [REDACTED];
- The email account [REDACTED];
- The email account [REDACTED]

- The iCloud account associated with [REDACTED] and registration email

[REDACTED].

3. On February 14, 2023, I was the owner and operator of a cellphone assigned call number [REDACTED].

I swear and subscribe to the foregoing statements made. I understand that if any of the foregoing statements made are false, I am subject to the penalty of perjury.



Wael Hana

Dated: January 15, 2024